Christine Jines Corporate Manager-Federal Regulatory SBC Communications Inc. 1401 I Street, N.W. Suite 1100 Washington, D.C. 20005 Phone 202 326-8879 Fax 202 408-4806



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September 26, 1997

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

EX PARTE

Mr. William F. Caton Acting Secretary Federal Communications Commission 1919 M Street, NW Room 222 Washington, DC 20554

Re: CC Docket No 93-162 - In the Matter of Local Exchange Carrier's Rates, Terms and Conditions for Expanded Interconnection Through Physical Collocation for Special Access and Switched Transport

Dear Mr. Caton:

The attached document, regarding the above mentioned docket, was discussed with Richard Kwiatkowski of the Competitive Pricing Division, Common Carrier Bureau on September 25, 1997.

In accordance with 47 C.F.R.§ 1.1206(a)(1) of the Commission's rules, the original of this letter and one copy are being filed with your office. Acknowledgment and date of receipt are requested. A duplicate of this letter is included for this purpose.

Sincerely,

Chris Jues

cc: Richard Kwiatkowski

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September 26, 1997

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Mr. William F. Caton Acting Secretary Federal Communications Commission 1919 M Street, NW Room 222 Washington, DC 20554

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Sincerely,

Allacilliteill

cc: Richard Kwiatkowski

		TE	RMINATIO	N EQUIPMEN	T FUNCTION				
				Recurring					
			Partition	ed from Cross	Connect				
				Rate Element	Rate Element	Rate Element	Rate Element	Rate Element	Rate Element
				Name #1	Name #2	Name #3	Name #4	Name #5	Name #6
				D\$1	DS1 POT Bay	DS1 Repeater	DS3	DS3 POT Bay	DS3 Repeater
1	TOTAL INVESTMENT (List)			\$215.58	\$21.74	\$323.99	\$2,544.09	\$257.15	\$1,639.64
	Account Name	Acct #	Depr Life						
2	Land	2111	N/A	\$1.76	\$0.18	\$2.64	\$20.75	\$2.10	\$13.38
3	Building	2121	34.5 Yrs	\$20.53	\$2.07	\$30.86	\$242.30	\$24.49	\$156.16
4	Digital Circuit COE	2232	11.8 Yrs	\$193.29	\$19.49	\$290.49	\$2,281.04	\$230.56	\$1,470.10
5	Conduit	2441	45.5 Yrs						
6									
7	(State & Federal Income Tax)			\$5.36	\$0.54	\$8.05	\$63.2 1	\$6.39	\$40.74
8	DEPRECIATION			\$17.02	\$1.72	\$25.59	\$200.91	\$20.31	\$129.49
9	COM (\$)			\$13.54	\$1.36	\$20.34	\$159.75	\$16.15	\$102.96
10	COM (As a Percent of Gross Investr	nent)		6.28%	6.26%	6.28%	6.28%	6.28%	6.289
11	FEDERAL INCOME TAX			\$4.21	\$0.42	\$6.32	\$49.62	\$5.02	\$31.98
12	STATE/LOCAL INC TAX			\$1.15	\$0.12	\$1.73	\$13.59	\$1.37	\$8.76
13	OTHER TAX: See Admin (Below, Ln	s 38 &39)							
14	MAINTENANCE EXPENSE			\$2.74	\$0.28	\$4.12	\$32.36	\$3.27	\$20.85
15	TOTAL ADMINISTRATIVE EXPENS	E (List)		\$11.64	\$1 .17	\$17.49	\$137.30	\$13.68	\$88.49
16	Sales	6612		\$1.08	\$0.11	\$1.63	\$12.76	\$1.29	\$8.22
17	Product Advertising	6613		\$0.01	\$0.00	\$0.01	\$0.09	\$0.01	\$0.06
18	Product Mangement	6611		\$0.57	\$0.06	\$0.86	\$6.78	\$0.69	\$ 4.37
19	Customer Service	6623		\$1.46	\$0.15	\$2.19	\$17.23	\$1.74	\$11.10
20	Operator Services	6621		\$0.12	\$0.01	\$ 0.17	\$1.37	\$0.14	\$0.88
21	Number Service	6622		\$0.64	\$0.06	\$0.97	\$7.60	\$0.77	\$4.90
22	Accounting	6721		\$0.17	\$0.02	\$0.26	\$2.04	\$0.21	\$1.32
23	Human Resources	6723		\$0.40	\$0.04	\$0.61	\$4.76	\$0.48	\$3.07
24	Motor Vehicle Expense	6112		\$0.01	\$0.00	\$0.01	\$0.06	\$0.01	\$0.04
25	Land & Building Expense	6121°		\$0.84	\$0.08	\$1.26	\$9.90	\$1.00	\$6.38
26	Gen Purpose Computers	6124		\$0.20	\$0.02	\$0.30	\$2.34	\$0.24	\$1.51
27	Network Administration	6532		\$0.43	\$0.04	\$0.65	\$5.08	\$0.51	\$3.26
28	Testing	6533		\$0,11	\$0.01	\$0.17	\$1.35	\$0.14	\$0.87

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-	Account Name	Acct #	Depr Life	\$03. 11	\$0.00	\$54.00	40.13.10	\$65.25	\$710.1
1 TC	TAL INVESTMENT (List)	 		\$63.11	\$6.36	\$94.80	\$843.78	\$85.29	\$479.7
+		 		DS1	DS1 POT Bay	DS1 Repeater	DS3	DS3 POT Bay	DS3 Repeater
+		 		Rate Element Name #1	Rate Element Name #2	Rate Element Name #3	Rate Element Name #4	Rate Element Name #5	Rate Element Name #6
-	<u> </u>		Pankion	od from Cross		G-4- E1	Oata Elamani	D-t- Classic	Pola Star 1
		-	P1 - 4741	Recurring					
_ _	CROSS-C	CONNEC	CTION CA	BLE AND CAL	SLE SUPPOR	TFUNCTION		ļ	
\bot	AF 222	100000							
Lin	ne 43: Official Company Services is	s comprise	ed of multiple	accounts					
	e 41: Excludes 7240.1 (Property T		Ll						
	ne 25: Excludes 6121.1 (Land & Bu		ntenance) w	hich is in the Build	ing Maintenance f	actor			
	DTES								
49 RA	ITIO: Rate/Total Direct Cost			1.10	1.09	1.10	1.10	1.10	1.1
48 RA	TIO: Rate/Direct Cost less Direct	Admin		1.43	1.42	1.43	1.43	1.43	1.
47 UN	IT OF MEASUREMENT			Cross Connect	Cross Connect	Cross Connect	Cross Connect	Cross Connect	Cross Conne
	ONTHLY RATE PER UNIT			\$4.62	\$0.46	\$6.93	\$54.45	\$5.50	\$35.0
45 MONTHLY COST PER UNIT				\$4.19	\$0.42	\$6.30	\$49.46	\$5.00	\$31.6
	INUAL COST PER UNIT			\$50.30	\$5.07	\$75.59	\$593.53	\$60.00	\$382.5
43	Official Company Services			\$0.40	\$0.04	\$0.59	\$4.67	\$0.47	\$3.0
42	Amounts Chgd Construction	7340		(\$0.30)	(\$0.03)	(\$0.44)	(\$3.49)	(\$0.35)	(\$2.2
41	Oth Operating Taxes	7240*		\$0.10	\$0.01	\$0.15	\$1.17	\$0.12	\$0.7
40	Property Taxes	7240.1		\$1.37	\$0.14	\$2.05	\$16.13	\$1.63	\$10.4
39	Underground Cable Transfers	6422.8		(\$0.00)	(\$0.00)	(\$0.00)	(\$0.01)	(\$0.00)	(\$0.5 (\$0.0
36	Circuit Equipment Transfers	6232.8		(\$0.01)	(\$0.00) (\$0.01)	(\$0.01) (\$0.19)	(\$0.07) (\$1.50)	(\$0.01)	(\$0.9
36	Digital Electronic Transfers Electronic Change Transfers	6212.8 6215.8		(\$0.04) (\$0.01)	(\$0.00)	(\$0.06)	(\$0.47)	(\$0.05) (\$0.01)	(\$0.3 (\$0.0
35	Analog Electronic Transfers	6211.8		(\$0.18)	(\$0.02)	(\$0.27)	(\$2.09)	(\$0.21)	(\$1.3
34	Other General/Admin	6728.5		\$0.08	\$0.01	\$0.12	\$0.93	\$0.09	\$0.6
33	Procurement	6726		\$0.18	\$0.02	\$0.26	\$2.08	\$0.21	\$1.3
32	Information Management	6724		\$1.20	\$0.12	\$1.80	\$14.15	\$1.43	\$9.1
31	External Relations	6722		\$0.13	\$0.01	\$0.19	\$1.51	\$0.15	\$0.9
30	Engineering	6535		\$1.95	\$0.20	\$2.94	\$23.05	\$2.33	\$14.8
29	Plant Operations Admin	6534		\$0.84	\$0.08	\$1.26	\$9.88	\$1.00	\$6.3

2	Land	2111	N/A	\$0.52	\$0 .05	\$0.77	\$6.88	\$0.70	\$3.91
3	Building	2121	34.5 Yrs	\$6.01	\$0.61	\$9.03	\$80.37	\$8.12	\$45.70
4	Digital Circuit COE	2232	11.8 Yrs	\$56.58	\$5.70	\$85.00	\$756.53	\$76.47	\$430.16
5	Conduit	2441	45.5 Yrs						
6									
7 (State & Federal Income Tax)			\$1.57	\$0.16	\$2.36	\$20.96	\$2.12	\$11.92
8 0	EPRECIATION			\$4.99	\$0.50	\$7.49	\$66.63	\$6.74	\$37.69
9 0	COM (\$)			\$3.96	\$0.40	\$5.95	\$52.98	\$5.36	\$30.13
10 C	OM (As a Percent of Gross Investm	ent)		6.27%	6.29%	6.28%	6.28%	6.28%	6.28%
11 F	EDERAL INCOME TAX			\$1.23	\$0.13	\$1.85	\$16.45	\$1.66	\$9.36
12 S	TATE/LOCAL INC TAX			\$0.34	\$0.03	\$0.51	\$4.51	\$0.46	\$2.56
13 C	OTHER TAX: See Admin (Below, Los	38 &39)							
14 N	MAINTENANCE EXPENSE			\$0.80	\$0.08	\$1.21	\$10.73	\$1.09	\$6.10
15 T	OTAL ADMINISTRATIVE EXPENSI	E (List)		\$3.41	\$0.34	\$5.12	\$45.54	\$4.60	\$25.89
16	Sales	6612		\$0.32	\$0.03	\$0.48	\$4.23	\$0.43	\$2.41
17	Product Advertising	6613		\$0.00	\$0.00	\$0.00	\$0.03	\$0.00	\$0.02
18	Product Mangement	6611		\$0.17	\$0.02	\$0.25	\$2.25	\$0.23	\$1.28
19	Customer Service	6623		\$0.43	\$0.04	\$0.64	\$5.71	\$0.58	\$3.25
20	Operator Services	6621		\$0.03	\$0.00	\$0.05	\$0.45	\$0.05	\$0.26
21	Number Service	6622		\$0.19	\$0.02	\$0.28	\$2.52	\$0.25	\$1.43
22	Accounting	6721		\$0.05	\$0.01	\$0.08	\$0.68	\$0.07	\$0.38
23	Human Resources	6723		\$0.12	\$0.01	\$0.18	\$1.58	\$0.16	\$0.90
24	Motor Vehicle Expense	6112		\$0.00	\$0.00	\$0.00	\$0.02	\$0.00	\$0.01
25	Land & Building Expense	6121*		\$0.25	\$0.02	\$0.37	\$3.28	\$0.33	\$1.87
26	Gen Purpose Computers	6124		\$0.06	\$0.01	\$0.09	\$0.76	\$0.08	\$0.44
27	Network Administration	6532		\$0.13	\$0.01	\$0.19	\$1.69	\$0.17	\$0.96
28	Testing	6533		\$0.03	\$0.00	\$0.05	\$0.45	\$0.05	\$0.26
29	Plant Operations Admin	6534		\$0.25	\$0.02	\$0.37	\$3. 2 8	\$0.33	\$1.86
30	Engineering	6535		\$0.57	\$0.06	\$0.86	\$7.64	\$0.77	\$4.35
31	External Relations	6722		\$0.04	\$0.00	\$0.06	\$0.50	\$0.05	\$0.29
32	Information Management	6724		\$0.35	\$0.04	\$0.53	\$4.69	\$0.47	\$2.67
33	Procurement	67 26		\$0.05	\$0.01	\$0.08	\$0.69	\$0.07	\$0.39
34	Other General/Admin	6728.5		\$0.02	\$0.00	\$0.03	\$0.31	\$0.03	\$0.17
35	Analog Electronic Transfers	6211.8		(\$0.05)	(\$0.01)	(\$0.08)	(\$0.69)	(\$0.07)	(\$0.39
36	Digital Electronic Transfers	6212.8		(\$0.01)	(\$0.00)	(\$0.02)	(\$0.15)	(\$0.02)	(\$0.09

	Building Digital Circuit COE Conduit Late & Federal Income Tax)	2121 2232 2441	34.5 Yrs 11.6 Yrs 45.5 Yrs	\$4.71 \$44.26 \$1.23 \$3.90	\$0.47 \$4.46 \$0.12 \$0.39	\$7.07 \$66.52 \$1.84 \$5.86	\$0.00 \$0.00 \$0.00	\$0.00 \$0.00 \$0.00 \$0.00	\$35.76 \$336.66 \$9.3:
3 4 5 6	Building Digital Circuit COE Conduit	2232	11.6 Yrs	\$44.26	\$4.46	\$66.52	\$0.00	\$0.00	\$336.6
3 4 5	Building Digital Circuit COE	2232	11.6 Yrs						
3	Building Digital Circuit COE	2232	11.6 Yrs						
3	Building								
		0.000	04.634	Ac-4		A 1			
_	Land	2111	N/A	\$0.40	\$0.04	\$0.60	\$0.00	\$0.00	\$3.0
	Account Name	Acct #					<u> </u>		
1 10	TAL (NVESTMENT (List)	<u> </u>		\$49.37	\$4.97	\$74.19	\$0.00	\$0.00	\$375.4
		ļ		DS1		DS1 Repeater	DS3		DS3 Repeater
				Name #1	Name #2	Name #3	Name #4	Name #5	Name #6
				Rate Element	Rate Element	Rate Element	Rate Element	Rate Element	Rate Elemen
			Partition	ed from Cross	Connect				
				Recurring					
	1	CROSS	CONNEC	TION EQUIP	MENT FUNCT	ON			
	e 43: Official Company Services is		ed of multiple	accounts					
	e 41: Excludes 7240.1 (Property 7		Renance) W	INCHES BUILDE DUIC	INA IARTINECISATION P	auui			
	7165 le 25: Excludes 6121.1 (Land & Bu	liidine Mei	nienacce) w	hich is in the Build	ino Maintenacos S	ador			
• NO	DTES	+							
19 RA	ATIO: Rate/Total Direct Cost			1.10	1.14	1.10	1.10	1,10	1.
	TIO: Rate/Direct Cost less Direct	Admin		1.43	1.47	1.43	1.43	1.43	1.
-	HT OF MEASUREMENT			Cross Connect	Cross Connect	Cross Connect	Cross Connect	Cross Connect	Cross Conn
46 MONTHLY RATE PER UNIT				\$1.35	\$0.14	\$2.03	\$18.05	1.83	\$10.2
45 MC	5 MONTHLY COST PER UNIT			\$1.23	\$0.12	\$1.84	\$16.40	\$1.66	\$9.3
14 AN	INUAL COST PER UNIT			\$14.73	\$1.48	\$22.13	\$196.84	\$19.91	\$111.
43	Official Company Services	•		\$0.12	\$0.01	\$0.17	\$1.55	\$0.16	\$0.0
42	Amounts Chad Construction	7340		(\$0.09)	(\$0.01)	(\$0.13)	(\$1.16)	(\$0.12)	(\$0.1
41	Oth Operating Taxes	7240*		\$0.03	\$0.00	\$0.04	\$0.39	\$0.04	\$0.2
40	Property Taxes	7240.1		\$0.40	\$0.04	\$0.60	\$5.35	\$0.54	\$3.0
· I _	Underground Cable Transfers	6422.8		(\$0.00)		(\$0.00)	(\$0.00)	(\$0.00)	(\$0.0
38	Circuit Equipment Transfers	6232.8		(\$0.00) (\$0.04)		(\$0.00) (\$0.06)	(\$0.02) (\$0.50)	(\$0.00) (\$0.05)	(\$0.0 (\$0.2

10 CC	M (As a Percent of Gross Investm	ent)	6.28%	6.24%	6.28%	#DIV/0!	#DIV/0!	6.28%
11 FE	DERAL INCOME TAX		\$0.97	\$0.09	\$1.44	\$0.00	\$0.00	\$7.32
12 ST	ATE/LOCAL INC TAX		\$0.26	\$0.03	\$0.40	\$0.00	\$0.00	\$2.01
13 OT	HER TAX: See Admin (Below, Lns	38 & 39)						·
14 MA	INTENANCE EXPENSE		\$0.63	\$0.06	\$0.94	\$0.00	\$0.00	\$4.78
15 TO	TAL ADMINISTRATIVE EXPENSE	E (List)	\$2.66	\$0.27	\$4.00	\$0.00	\$0.00	\$20.26
16	Sales	6612	\$0.25	\$0.03	\$0.37	\$0.00	\$0.00	\$1.88
17	Product Advertising	6613	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.01
18	Product Mangement	6611	\$0.13	\$0.01	\$0.20	\$0.00	\$0.00	\$1.00
19	Customer Service	6623	\$0.33	\$0.03	\$0.50	\$0.00	\$0.00	\$2.54
20	Operator Services	6621	\$0.03	\$0.00	\$0.04	\$0.00	\$0.00	\$0.20
21	Number Service	6622	\$0.15	\$0.01	\$0.22	\$0.00	\$0.00	\$1.12
22	Accounting	6721	\$0.04	\$0.00	\$0.06	\$0.00	\$0.00	\$0.30
23	Human Resources	6723	\$0.09	\$0.01	\$0.14	\$0.00	\$0.00	\$0.70
24	Motor Vehicle Expense	6112	\$0.00	\$0.00	\$0.00	\$0,00	\$0.00	\$0.01
25	Land & Building Expense	6121*	\$0.19	\$0.02	\$0.29	\$0.00	\$0.00	\$1.46
26	Gen Purpose Computers	6124	\$0.05	\$0.00	\$0.07	\$0.00	\$0.00	\$0.34
27	Network Administration	6532	\$0.10	\$0.01	\$0.15	\$0.00	\$0.00	\$0.75
28	Testing	6533	\$0.03	\$0.00	\$0.04	\$0.00	\$0.00	\$0.20
29	Plant Operations Admin	6534	\$0.19	\$0.02	\$0.29	\$0.00	\$0.00	\$1.46
30	Engineering	6535	\$0.45	\$0.05	\$0.67	\$0.00	\$0.00	\$3.40
31	External Relations	6722	\$0.03	\$0.00	\$0.04	\$0.00	\$0.00	\$0.22
32	Information Management	6724	\$0.27	\$0.03	\$0.41	\$0.00	\$0.00	\$2.09
33	Procurement	6726	\$0.04	\$0.00	\$0.06	\$0.00	\$0.00	\$0.31
34	Other General/Admin	6728.5	\$0.02	\$0.00	\$0.03	\$0.00	\$0.00	\$0.14
35	Analog Electronic Transfers	6211.8	(\$0.04)	(\$0.00)	(\$0.06)	\$0.00	\$0.00	(\$0.31)
36	Digital Electronic Transfers	6212.8	(\$0.01)	(\$0.00)	(\$0.01)	\$0.00	\$0.00	(\$0.07)
37	Electromechanical Transfers	6215.8	(\$0.00)	(\$0.00)	(\$0.00)	\$0.00	\$0.00	(\$0.01)
38	Circuit Equipment Transfers	6232.8	(\$0.03)	(\$0.00)	(\$0.04)	\$0.00	\$0.00	(\$0.22)
39	Underground Cable Transfers	6422.8	(\$0.00)	(\$0.00)	(\$0.00)	\$0.00	\$0.00	(\$0.00)
40	Property Taxes	7240.1	\$0.31	\$0.03	\$0.47	\$0.00	\$0.00	\$2.38
41	Oth Operating Taxes	72 40 °	\$0.02	\$0.00	\$0.03	\$0.00	\$0.00	\$0.17
42	Amounts Chgd Construction	7340	(\$0.07)	(\$0.01)	(\$0.10)	\$0.00	\$0.00	(\$0.52)
43	Official Company Services	۵	\$0.09	\$0.01	\$0.14	\$0.00	\$0.00	\$0.69
44 AN	NUAL COST PER UNIT		\$11.52	\$1.15	\$17.30	\$0.00	\$0.00	\$87.60

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45	MO	NTH	LY COST PER UNIT			\$0.96	\$0.10	\$1.44	\$0.00	\$0.00	\$7.30
46	MO	HTM	LY RATE PER UNIT			\$1.05	\$0.11	\$1.59	\$0.00	\$0.00	\$8.03
47	UN	IT O	MEASUREMENT			Cross Connect	Cross Connect	Cross Connect	Cross Connect	Cross Connect	Cross Connect
48	RA	TIO:	Rate/Direct Cost less Direct	Admin		1.42	1.50	1.43	#D(V/01	#DIV/01	1.43
49	RA.	TIO:	Rate/Total Direct Cost			1.09	1.15	1.10	#DIV/0	#DIV/0!	1.10
•	NO	TES									
_	Line	25:	Excludes 6121.1 (Land & Bu	ilding Mai	ntenance) w	hich is in the Buildi	ng Maintenance f	actor			
	Line	e 41:	Excludes 7240.1 (Property T	axes)							
	Line	e 43:	Official Company Services is	comprise	d of multiple	accounts					